## REMARKS

Claims 1-56 are pending in the present application. In an October 5, 2005, Office Action (herein "Office Action"), Claims 1-56 were rejected. Claims 1, 2, 4-6, 8-15, 19-22, 24-26, 28-34, 38, 39, 41, 42, 44-51, 55, and 56 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2002/0097322, to Monroe et al. (hereinafter "Monroe"). Additionally, Claims 3, 7, 23, 27, 40, and 43 were rejected under 35 U.S.C. § 103(a) as being obvious over Monroe. Claims 16-18, 35-37, and 52-54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of U.S. Patent Publication No. 2001/0039579, to Trcka et al. (hereinafter "Trcka").

For the following reasons, applicants respectfully submit that the prior art, alone or in combination, fails to teach or suggest elements claimed in the present application. Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and the cited references is presented.

Summary of the Present Invention

The present invention is related to a system and method for processing digital images for display on a graphical user interface. A processing server obtains a first frame of image data corresponding to an output from a digital capture device. The processing server may display the first frame of data within a display area on the graphical user interface. In response, the processing server may obtain a designation of at least one processing zone from the user interface device. Each processing zone corresponds to a specific geometric shape and includes processing rule data. The processing server displays the processing zone of the graphical user interface. The processing server then obtains a second frame of image data corresponding to the output from the digital capture device. The processing server determines whether variations occurred between the first and second frames within the processing zone by evaluating

VIGL\18276AM2.DOC

differential data corresponding to an adjustable parameter. If the server determines that variations occurred, the processing server processes an event.

Monroe et al. (U.S. Publication No. 2002/0097322)

Monroe is purportedly directed towards a system for capturing, encoding, and transmitting continuous video from multiple sources to a display monitor via a network. In accordance with the teachings of Monroe, a display screen includes an illustration of the location of the cameras and an indication of the direction of the camera angle. The monitor includes a display area for displaying selected cameras and for controlling the selection, display, and direction of the cameras from a remote location. The display screen can be configured to display one or any combination of cameras. A control panel provided on the primary monitor controls the secondary monitors.

The Claims Distinguished

Claim 1

As amended, Claim 1 recites the following:

> 1. A method for processing image data, the method comprising:
> obtaining at least one processing zone for processing digital data obtained
> from a digital capture device, wherein the at least one processing
> zone corresponds to a specific geometry;
> obtaining a first frame of image data corresponding to the digital capture
> device;
> obtaining a second frame of image data corresponding to the digital
> capture device;
> determining whether there is significant change between the first and
> second frames within the at least one processing zone, wherein the
> determination of significant change is made by evaluating
> differential data corresponding to an adjustable parameter; and
> processing an event if a significant change is determined.

Claim 1 recites, "obtaining at least one processing zone for processing digital data obtained from a digital capture device; obtaining a first frame of image data corresponding to the digital capture device" and "obtaining a second frame of image data from the digital capture device." Monroe does not teach the designation of at least one processing zone for determining

VIGL\18276AM2.DOC

variations between a first frame of image data and a second frame of image data that is obtained using the same digital capture device. The Office Action states, with regard to Claim 1, "the at least one processing zone is obtained from one or more digital capture devices. This implies that each zone may reflect **image data that correspond to each individual camera**." (Emphasis added.) (Office Action at page 2.) Applicants respectfully disagree with the assessment that the language recited in Claim 1 "implies that each zone may reflect image data that correspond to each individual camera." However, to clarify, Claim 1 was amended to reflect that the designation of at least one processing zone is associated with data captured using the same device, namely "the digital capture device" that is recited in each element of Claim 1. The reference to "one or more digital capture devices" was removed to clarify that, while aspects of the present invention may use one or more digital capture devices, images captured using these multiple devices are not each designated a processing zone. Thus, applicants submit that Claim 1 is in condition for allowance as amendments have been made that address the objection raised in the pending Office Action.

In addition to the reasoning stated above, Claim 1 of the present application is allowable for additional reasons. In this regard, Claim 1 recites a method for determining whether a significant change occurred between two images. More specifically, the claimed method recites, "determining whether there is a significant change between the first and second frames within the at least one processing zone, wherein the determination of significant change is made by evaluating differential data corresponding to an adjustable parameter." The Office Action asserts that Monroe teaches using MPEG compression on different processing zones and "MPEG inherently evaluates differential processing of consecutive image frames, e.g., between previous and current frames to determine motion shift of pixels in these frames. Thus, when automatic event detection is utilized in Monroe to activate the surveillance camera based on motion detection, MPEG would inherently provide the motion information." (Office Action at page 4.)

VIGL\18276AM2.DOC

The Office Action reads teachings into Monroe with regard to Claim 1 that are not supported by the reference. Applicants agree that Monroe discloses a system in which actions are taken in response to detecting motion. (Monroe at ¶ 102.) Moreover, applicants agree that Monroe utilizes MPEG compression to encode video streams that are transmitted to remote monitoring stations. (Monroe at ¶ 17.) However, the teachings of Monroe do not support the assertion that "when automatic event detection is utilized in Monroe to activate the surveillance camera based on motion detection, MPEG would inherently provide the motion information." (Office Action at page 4.) Monroe does not teach utilizing information available as a result of MPEG compression to perform motion or any other type of event detection. Instead, as stated in Monroe, "an event detection sensor will cause a camera to be activated." (Monroe at ¶ 102.) Moreover, performing event detection "can include any number of event sensors ranging from panic buttons to fire detection to motion detection and the like." (Monroe at ¶ 102.) All of the examples of ways to perform event detection described in Monroe use a hardware-based control such as a button or sensor to perform event detection. Moreover, applicants are unable to find any reference in Monroe to identifying events utilizing information obtained as a result of performing MPEG compression. Thus, since Monroe only uses hardware-based controls to perform event detection, a method that evaluates "differential data corresponding to an adjustable parameter," as recited in Claim 1, is not disclosed.

For at least the above-mentioned reasons, applicants respectfully submits that the Office Action has not established a prima facie case for a Section 102(e) rejection of Claim 1, and respectfully requests that the rejection of Claim 1 and the claims dependent thereon be withdrawn.

Claim 21

As amended, Claim 21 recites:

21.    A system for providing security monitoring, the system comprising:

VIGL\18276AM2.DOC

one or more monitoring locations including a monitoring device operable to generate a video image;

a central processing server operable to obtain the digital image and generate a user interface;

at least one monitoring computing device operable to display the user interface and to obtain one or more processing zones corresponding to the image data, wherein the central processing server processes the data according to the user's specified input.

Similar to the description provided above with regard to Claim 1, the Office Action asserts that the language recited in Claim 21 "implies that each zone may collect image data that correspond to each individual camera." (Office Action at page 2.) Applicants respectfully disagree with the assessment that the language recited in Claim 1 implies that each zone may reflect image data that correspond to each individual camera. However, for clarification purposes only, Claim 21 was amended to reflect that the designation of at least one processing zone on the received image originates from a monitoring device operable to generate a video image. The reference to the "at least one monitoring device" previously recited in Claim 21 was removed to clarify that, while aspects of the present invention may use one or more monitoring devices, images captured these devices are not each designated a processing zone. Thus, applicants submit that Claim 21 is in condition for allowance as amendments have been made that address the objection raised in the Office Action.

Claim 38

Claim 38 recites the following:

38.    In a computer system having a graphic user interface including a display and a user interface device, a method for processing image data, the method comprising:

obtaining a first frame of image data corresponding to an output from a digital capture device;

displaying the first frame of data within a display area in the graphical user interface;

obtaining a designation of at least one processing zone from the user interface device, wherein the processing zone corresponds to a specific geometric shape within the display area and includes processing rule data;

-13-

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS^PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

VIGL\18276AM2.DOC

displaying the processing zone within the display area of the graphical user interface;

obtaining a second frame of image data corresponding to the output from the digital capture device;

determining whether there is significant change between the first and second frames within the at least one processing zone, wherein the determination of significant change is made by evaluating differential data corresponding to an adjustable parameter; and

processing an event if a significant change is determined.

Monroe does not teach the designation of at least one processing zone for determining variations between a first frame of image data and a second frame of image data that is obtained using the same digital capture device. Claim 38 recites obtaining a first frame of image data corresponding to **a digital capture device** and obtaining a second frame of image data from **the digital capture device."** The Office Action states, "the processing zone corresponds to a specific geometric shape within the display area, i.e., the GUI, not within the display image as argued." (Office Action at page 2.) This statement in the Office Action is based on the assumption that the GUI may designate processing zones for multiple images that originate from more than one digital capture device. However, Claim 38 only recites obtaining first and second images from a single device, namely "the digital capture device." While aspects of the present invention may use one or more digital capture devices, images captured using these devices are not each designated a processing zone as reflected in Claim 38.

In addition to the reasoning stated above, Claim 38 of the present application is allowable for additional reasons. In this regard, Claim 38 recites a method for determining whether a significant change occurred between two images. More specifically, the claimed method recites "determining whether there is significant change between the first and second frames within the at least one processing zone, wherein the determination of significant change is made by evaluating differential data corresponding to an adjustable parameter." The Office Action asserts that Monroe teachers using MPEG compression on different processing zones and "MPEG inherently evaluates differential processing of consecutive image frames, e.g., between previous

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS™
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

VIGL\18276AM2.DOC

and current frames to determine motion shift of pixels in these frames. Thus, when automatic event detection is utilized in Monroe to activate the surveillance camera based on motion detection, MPEG would inherently provide the motion information." (Office Action at page 4.)

Similar to the description provided above with reference to Claim 1, the Office Action reads teachings into Monroe with regard to Claim 38 that are not supported by the reference. Applicants agree that Monroe discloses a system in which actions are taken in response to detecting motion. (Monroe at ¶ 102.) Moreover, applicants agree that Monroe utilizes MPEG compression to encode video streams that are transmitted to remote monitoring stations. (Monroe at ¶ 17.) However, the teachings of Monroe do not support the assertion that "when automatic event detection is utilized in Monroe to activate the surveillance camera based on motion detection, MPEG would inherently provide the motion information." (Office Action at page 4.) Monroe does not teach utilizing information available as a result of MPEG compression to perform motion or any other type of event detection. Instead, as stated in Monroe, "an event detection sensor will cause a camera to be activated." (Monroe at ¶ 102.) Moreover, performing event detection "can include any number of event sensors ranging from panic buttons to fire detection to motion detection and the like." (Monroe at ¶ 102.) All of the examples of ways to perform event detection described in Monroe use a hardware-based control such as a button or sensor. Moreover, applicants are unable to find any reference in Monroe to performing event detection utilizing information obtained as a result of performing MPEG compression. Thus, since Monroe only uses hardware-based controls to perform event detection, a method that evaluates "differential data corresponding to an adjustable parameter," as recited in Claim 38, is not disclosed.

Under section 102(e), a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (February 2003.) Applicants respectfully submit that Monroe fails to expressly or inherently

VIGL\18276AM2.DOC

teach, disclose, or suggest each and every element of Claim 38. As explained above, Monroe fails to disclose or suggest evaluating differential data corresponding to an adjustable parameter. Accordingly, applicants respectfully request withdrawal of the pending rejection with regard to Claim 38.

<u>Claims 2-20, 22-37, and 39-56</u>

Dependent Claims 2, 4-6, 8-15, 19, 20, 22, 24-26, 28-34, 39, 41, 42, 44-51, 55, and 56 were rejected under 35 U.S.C. § 102(e) as anticipated by Monroe. Additionally, Claims 3, 7, 23, 27, 40, and 43 were rejected under 35 U.S.C. § 103(a) as obvious over Monroe. Claims 16-18, 35-37, and 52-54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of Trcka. Since a dependent claim carries each and every limitation of the claim it depends on, the references, either alone or in combination, fail to teach or suggest each of the limitations as discussed above. Applicants further submit that the additional cited references fail to address the deficiencies associated with Monroe. Accordingly, for this reason, applicants respectfully request withdrawal of the rejection of these claims. In addition, applicant submits that the dependent claims are allowable for additional reasons described below.

Dependent Claims 14, 33, and 50 add to applicant's invention the step of processing an "event according to a user defined sequence." The Office Action asserts that Monroe teaches this additional element recited in Claims 14, 33, and 50, stating that "the process of activating a camera, highlighting it on the map and displaying it on the video display zone after an event detection qualifies as a user defined sequence." (Office Action at page 6.) However, the process of activating a camera, highlighting it on the map, and displaying it on the video display zone after an event detection is not a user defined sequence. Instead, these steps are taken automatically by the Monroe system. As stated in Monroe, "[W]hen automatic event detection is utilized, an event detection sensor will cause a camera to be activated, it will then be highlighted on the map and displayed on the video display zone." (Monroe at ¶ 102.) The steps are not defined by the user. Instead, the steps are performed automatically by the Monroe system in

VIGL\18276AM2.DOC

response to an event. A user defined sequence is not executed in response to an event. Instead, as clearly stated in Monroe, certain actions may be automatically performed by the Monroe system in response to an event being detected. Therefore, applicants respectfully submit that Claims 14, 33, and 50 are also in condition for allowance for these additional reasons.

## CONCLUSION

In view of the foregoing claim amendments and remarks, applicants submit that all of the pending claims are in condition for allowance. Reconsideration and favorable action are requested. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact applicants' undersigned attorney at the number provided below.

Respectfully submitted,

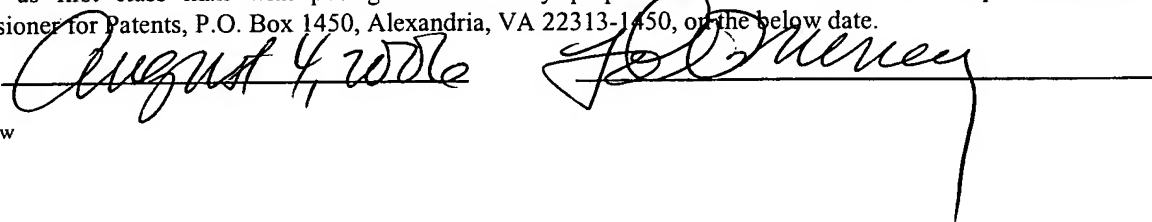CHRISTENSEN O'CONNOR
JOHNSON KINDNESS PLLC

Clint J. Feekes
Registration No. 51,670
Direct Dial No. 206.695.1633

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date:

CJF:lal/pww

VIGL\18276AM2.DOC